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Docket No. YOR999-201
YOR.093

REMARKS

Claims 1-7, 21 and 25-40 are all of the claims presently pending in the application. Claims 30 and 40 have been merely editorially amended for clarity. The claims have not been substantively amended by the present Amendment.

Entry of this Amendment is believed proper since no new issues are being presented to the Examiner that would require further consideration and/or search.

It is noted that the claim amendments are made only for more particularly pointing out the invention, and not for distinguishing the invention over the prior art, narrowing the claims or for any statutory requirements of patentability. Further, Applicants specifically state that no amendment to any claim herein should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claim.

Applicants gratefully acknowledge the Examiners' indication that claims 33-36 would be allowable if rewritten in independent form. However, Applicants respectfully submit that all of claims 1-7, 21 and 25-40 are allowable.

Claim 40 stands rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description. Claims 1-7, 21, 25-32 and 37 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Porter (U.S. Patent No. 6,473,892).

These rejections are respectfully traversed in the following discussion.

I. THE CLAIMED INVENTION

The claimed invention of exemplary claim 1 provides a method of linking domain knowledge to document knowledge that includes rendering document knowledge as textual components with variable fields, building an object-oriented domain model including domain knowledge and linking the document knowledge to the domain knowledge by linking the domain knowledge to document knowledge variables (e.g., see Application at page 4, line 17 through page 5, line 2). This provides a dynamic document-to-domain linkage that allows different domain knowledge elements to be dynamically manipulated during the interactive configuration of a document (see Application at page 5, lines 13-15). This allows the user to edit text as the user would in a regular word processor while maintaining constant and dynamic access to information provided by the document system (see Application at page 6, lines 11-13).

II. THE WRITTEN DESCRIPTION REJECTION

The Examiner has rejected claim 40 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Specifically, the Examiner alleges that the specification does not provide support for the recitation of a user dynamically manipulating a domain during document assembly.

Applicants have amended claim 40 as suggested by the Examiner. That is, claim 40 has been amended to recite "wherein elements of said domain model are dynamically manipulated by a ~~user~~ system software during an interactive configuration of a document" (emphasis added by Applicants).

Therefore, the Examiner is respectfully requested to reconsider and withdraw this rejection.

III. THE PRIOR ART REFERENCE

The Examiner alleges that Porter teaches the claimed invention of claims 1-7, 21, 25-32 and 37. Applicants submit, however, that there are elements of the claimed invention, which are neither taught nor suggested by Porter.

That is, Porter does not teach or suggest "*linking said document knowledge to said domain knowledge, by linking said domain knowledge to document knowledge variables*" as recited in independent claim 1, and as similarly recited in independent claims 21, 25 and 37.

The Examiner attempts to rely on Figures 1-10 and column 1, line 1 through column 20, line 34 of Porter to support his allegations. The Examiner, however, is clearly incorrect.

That is, nowhere in these figures nor this passage (nor anywhere else for that matter) does Porter teach or suggest linking the document knowledge to the domain knowledge by linking the domain knowledge to document knowledge variables.

In Porter, macros, text generators and form generators are created in a source code library. These are typical programs that call each other to solve different parts of a problem. In this case, they create different parts of a document and append them together.

Porter merely describes, at an abstract level, what happens in a specific document assembly session. For example, users provide input, domain information is collected,

document variables are instantiated and text is produced. However, Porter does not effectively support the development of systems dedicated to creating documents that describe domains of knowledge to meet the end-user's requirements, where one of the requirements is to reuse previously authored text and some description of the document and domain.

Indeed, Porter merely describes a conventional programming system, where procedures are used to generate forms (e.g., call procedures that generate sub-forms) until you get to procedures that generate text or ask for input and fill-in variables in that text. How one writes and organizes the code modules, the questions they ask, they text they produce, etc., are all determined by the programmer.

In stark contrast, the claimed invention focuses on explicitly defining declarative knowledge representations that enable the automatic assembly of documents through the automatic creation of a document assembly program. Automatic assembly means that no programming is required to produce document assembly systems for different documents, the reuse of different document text or for different domains. Rather, one merely needs to instantiate the key knowledge structures and write the text, which is what authors and subject matter experts, rather than programmers, are capable of performing. Indeed, the claimed invention does not require programmers to build specific document assembly applications.

The key and explicit knowledge structures that authors or subject matter experts can instantiate in the claimed invention to generate a document assembly application include an explicit domain model, a document model and a library of classified document components. No programs, macros or procedures are involved for the author's task.

Authors can create the document model and a library of document components, while subject matter experts can create domain models. No programmers or source code are required. All components of the knowledge structures are independently reusable.

Linking document components to document models also does not require programming procedures. Rather, it simply involves asserting declarative links between existing knowledge structures (e.g., pointing and clicking). To create a link, the user merely points at a class of document component in the document component library and then points to a document node (or section) in a specific document model. This type of link means that the indicated class must fill that part of the document outline. Thus, by simply adding more links, the possibilities for a valid filler for a document section is automatically narrowed.

The other type of link that can be made may also be a "point-and-click" link. Connecting a domain object to a document object allows the user to link properties of the domain object to fields (i.e., text variables) in the document component. Values of these objects may automatically be acquired from the end-user during document assembly.

Thus, in the claimed invention a person building a document assembly system instantiates declarative knowledge structures (i.e., type text, specify object names and their properties, link objects together, etc.). The person does not write programs that generate and assemble text, as in Porter.

Therefore, Applicants submit that there are elements of the claimed invention that are not taught or suggest by Porter. Therefore, the Examiner is respectfully requested to withdraw this rejection.

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IV. FORMAL MATTERS AND CONCLUSION

In response to Examiner's objections, the claims have been amended in a manner believed fully responsive to all points raised by the Examiner. Specifically, claim 30 has been amended to replace the term "them" with the phrase "the document knowledge variables".

In view of the foregoing, Applicants submit that claims 1-7, 21, and 25-40, all of the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

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The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Assignee's Deposit Account No. 50-0510.

Respectfully Submitted,

Date: January 23, 2006

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FACSIMILE TRANSMISSION

I hereby certify that I am filing this paper via facsimile, to Group Art Unit 2176, at (571) 273-8300, on January 23, 2006.

Respectfully Submitted,

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